

1 J. Stephen Peek
2 (Nevada Bar No. 1758)
3 HOLLAND & HART LLP
4 9555 Hillwood Drive, 2nd Floor
5 Las Vegas, NV 89134
6 Tel: 702.669.4600
7 Fax: 702.669.4650
8 speek@hollandhart.com

9 Tariq Mundiya (admitted *pro hac vice*)
10 Jeffrey B. Korn (admitted *pro hac vice*)
11 WILLKIE FARR & GALLAGHER LLP
12 787 Seventh Avenue
13 New York, New York 10019
14 (212) 728-8000
15 tmundiya@willkie.com
jkorn@willkie.com

16 Michael J. Gottlieb (admitted *pro hac vice*)
17 WILLKIE FARR & GALLAGHER LLP
18 1875 K Street, NW
19 Washington, DC 20006
20 (202) 303-1000
21 mgottlieb@willkie.com

22 *Attorneys for Plaintiffs*
23 *Jysan Holding, LLC; and*
24 *Jusan Technologies Ltd.*

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 JYSAN HOLDING, LLC, a Nevada Limited
28 Liability Company; JUSAN
TECHNOLOGIES LTD, an England and
Wales Limited Company;

29 Plaintiff,
30 v.

31 REPUBLIC OF KAZAKHSTAN, a foreign
32 sovereign state; THE AGENCY FOR
33 REGULATION AND DEVELOPMENT
34 OF THE FINANCIAL MARKET OF THE
35 REPUBLIC OF KAZAKHSTAN, a
Kazakhstan Government agency; THE
ANTI-CORRUPTION AGENCY OF THE
REPUBLIC OF KAZAKHSTAN, a
Kazakhstan Government anti-corruption
agency ; THE FINANCIAL MONITORING
AGENCY OF THE REPUBLIC OF

Case No. 2:23-cv-00247-JAD-VCF

STIPULATION AND ORDER TO
EXTEND TIME TO FILE DISCOVERY
PLAN AND SCHEDULING ORDER
(Second Request) AND TO RESPOND
TO MOTION TO DISMISS OR AMEND
THE COMPLAINT
(Fourth Request)

ECF Nos. 34, 35

1 KAZAKHSTAN, a Kazakhstan Government
2 agency; THE COMMITTEE FOR
3 NATIONAL SECURITY OF
4 KAZAKHSTAN, a Kazakhstan Government
5 intelligence agency; MADINA
6 ABYLKASSYMOVA, an individual;
OLZHAS KIZATOV, an individual;
ARMAN OMARBEKOV, an individual;
and ADILBEK DZHAKSYBEKOV, an
individual,

7 Defendants.

8
9 Defendants Madina Abylkassymova, Olzhas Kizatov, and Arman Omarbekov (the
10 “Government Official Defendants”) filed a Motion to Dismiss the Complaint on April 13, 2023
11 (ECF No. 23). Pursuant to the Court’s Order of June 2, 2023, the current deadline for the
12 parties to submit a proposed Discovery Plan and Scheduling Order is June 26, 2023 (ECF No.
13 31). Pursuant to the Court’s Order of June 2, 2023, the current deadline for Plaintiffs Jysan
14 Holding, LLC and Jusan Technologies Ltd. (“Plaintiffs”) to respond to the Motion to Dismiss
15 or to amend the Complaint is July 5, 2023 (ECF No. 33).

16 The parties are attempting to reach a resolution of this matter and require additional time
17 to achieve such resolution. The parties have conferred and reached agreement on a 60-day
18 extension of each deadline. This is the second stipulation for an extension of time to submit a
19 Discovery Plan and Scheduling Order, the fourth extension of time to respond to the
20 Government Official Defendants’ Motion to Dismiss, and the third extension of time to amend
21 the Complaint under Fed. R. Civ. P. 15(a)(1)(B).

22 **IT IS HEREBY STIPULATED AND AGREED** that the parties’ time to submit a
23 proposed Discovery Plan and Scheduling Order is extended to and including **August 25, 2023**,
24 and Plaintiffs’ time to respond to the Government Official Defendants’ Motion to Dismiss or
25 amend the Complaint pursuant to Fed. R. Civ. P. 15(a)(1)(B) is extended to and including
26 **September 5, 2023**¹.

27
28 ¹ September 3, 2023, is a Sunday, and the following day is a federal holiday.

1 DATED this 26th day of June, 2023.
2
3

4 **MCNUTT LAW FIRM, P.C.**

5 /s/ Daniel R. McNutt

6 Daniel R. McNutt, Bar No. 7815
11441 Allerton Park Drive, #100
Las Vegas, Nevada 89135

7 *Counsel for Defendants Madina
Abylkassymova,
Olzhas Kizatov, and Arman Omarbekov*

8 **HOLLAND & HART LLP**

9 /s/ J. Stephen Peek

10 J. Stephen Peek, Bar No. 1758
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134

11 *Counsel for Plaintiffs
Jysan Holding, LLC; and
Jusan Technologies Ltd.*

12 **ORDER**

13 **Based on the parties' stipulation [ECF Nos. 34, 35] and with good cause
14 appearing, IT IS SO ORDERED.**

15 

16

UNITED STATES DISTRICT JUDGE

17 DATED: 6/27/23